

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	Chapter 11
Grizzly Operating, LLC, <i>et al.</i> ,	§	Case No. 17-30560
Reorganized Debtors.	§	Jointly Administered
	§	
Grizzly Operating, LLC f/k/a Vanguard Operating, LLC, Plaintiff,	§	
vs.	§	
Sublette Co. Treasurer, Wyoming	§	Adv. No. 18-03244
Natrona Co. Treasurer, Wyoming	§	Adv. No. 18-03245
Johnson Co. Treasurer, Wyoming	§	Adv. No. 18-03247
Carbon Co. Treasurer, Wyoming	§	Adv. No. 18-03248
Park Co. Treasurer, Wyoming	§	Adv. No. 18-03249
Sweetwater Co. Treasurer, Wyoming	§	Adv. No. 18-03250
Board of Commissioners of Campbell Co., Wyoming	§	Adv. No. 18-03246
Defendants.	§	

**MEDIATORS STATEMENT REGARDING MEDIATION BETWEEN GRIZZLY
OPERATING, LLC AND WYOMING COUNTIES**

On Thursday July 22, 2021, Grizzly Operating, LLC, the Board of Commissioners of Campbell County, Wyoming, Carbon County Treasurer, Wyoming, Johnson County Treasurer, Wyoming, Natrona County Treasurer, Wyoming, Park County Treasurer, Wyoming, Sublette County Treasurer, Wyoming, and Sweetwater County Treasurer, Wyoming (the “Counties”) (collectively with Grizzly Operating, LLC, the “Parties”) mediated their disputes pending in the bankruptcy proceedings of Vanguard Natural Resources, LLC and its affiliates (Bankr. S.D. Tex. 17-30560) and Vanguard Natural Resources, Inc. and its affiliates (Bankr. S.D. Tex. 19-30786) before me, retired United States Bankruptcy Judge Kevin Gross.

The Parties negotiated in good faith and have reached a settlement in principle. The Parties are documenting their settlement agreement, which will then be subject to a ratification vote by each of the Counties' Board of Commissioners and execution by the Parties.

Dated: July 27, 2021

Respectfully Submitted,

/s/ Kevin Gross

Kevin Gross

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FORM OF STATEMENT AGREED TO BY:

/s/ James T. Grogan

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Counsel to Plaintiff Grizzly Operating LLC, f/k/a Vanguard Operating LLC

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